UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ALEXANDER CLIFFORD, individually and on behalf of all others similarly situated,

Plaintiff.

v.

KAYDEX PTE. LTD., LOI LUU, VICTOR TRAN, and YARON VENLER,

Defendants.

Case No. 1:20-cv-02812-RA

Honorable Ronnie Abrams

[PROPOSED] ORDER APPOINTING LEAD PLAINTIFF AND APPROVING SELECTION OF CO-LEAD COUNSEL

On this 7th day of August 2020, the Court considered Brett Messieh's Motion for Appointment of Lead Plaintiff and Approval of Selection of Co- Lead Counsel in the above-captioned action pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §77z-1(a)(3)(B). Having considered the Motion, and the materials submitted in support thereof, the Motion is **GRANTED**.

IT IS HEREBY ORDERED THAT:

- 1. Brett Messieh is appointed Lead Plaintiff in the above-captioned action.
- 2. The Court designates the law firms Roche Cyrulnik Freedman LLP and Selendy & Gay PLLC as Co-Lead Counsel in this action.
- 3. Co-Lead Counsel shall be generally responsible for coordinating activities during pretrial proceedings and shall:
 - a. Determine and present (in briefs, oral argument, or other fashion as may be appropriate, personally or by a designee) to the Court and opposing parties the

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position of Lead Plaintiff and the proposed class on all matters arising during

pretrial proceedings;

b. Coordinate the conduct of discovery on behalf of Lead Plaintiff and the proposed

class consistent with the requirements of Rule 26 of the Federal Rule of Civil

Procedure, including preparation of interrogatories and requests for production of

documents and the examination of witnesses in depositions;

c. Conduct settlement negotiations on behalf of Lead Plaintiff and the proposed class;

d. Enter into stipulations with opposing counsel as necessary for the conduct of the

litigation;

e. Prepare the case for and conduct trial; and

f. Perform such other duties as may be incidental to the proper coordination of pretrial

and trial activities or authorized by future order of the Court.

4. All securities class actions raising similar claims subsequently filed in or transferred to the

United States District Court for the Southern District of New York shall be consolidated

into this action, and this Order shall apply to every such action, absent any further order of

the Court.

Dated: August 7 ____, 2020

Honorable Ronnie Abrams

United States District Judge